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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

November 9, 2000

WRITER'S CONTACT INFORMATION
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Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 - 12th Street, SW
Washington, DC 20554

Attn: Patrick Forster, Senior Engineer
Room 3-A104
Policy Division
Wireless Telecommunications Bureau

Re: Southern Illinois RSA Partnership
d/b/a First Cellular of Southern Illinois,
Implementation Plan of Wireless E-911 Phase II
Automatic Location Identification
Notice Pertaining to CC Docket No. 94-102

Dear Ms. Salas:

On behalf of Southern Illinois RSA Partnership d/b/a First Cellular of Southern Illinois, we are transmitting herewith its Report on Implementation of Wireless E-911 Phase II Automatic Location Identification.

Please refer any inquiries or correspondence in connection with this matter to our offices.

Very truly yours,

Robert M. Jackson

Attachment
cc(w/att): Tania Seger

No. of Copies rec'd 0+4
List ABCDE

SOUTHERN ILLINOIS RSA PARTNERSHIP
D/B/A FIRST CELLULAR OF SOUTHERN ILLINOIS
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Mt. Vernon, Illinois 62864

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Magalie Roman Salas, Secretary
Office of the Secretary
445 - 12th Street, S.W.
Washington, D.C. 20554

Attention: Patrick Forster, Senior Engineer
Room 3-A104
Policy Division
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Re: Implementation Plan of Wireless E-911 Phase II
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Notice Pertaining to CC Docket No. 94-102

E-911 PHASE II STATUS REPORT

Dear Ms. Salas:

In accordance with the Third Report and Order in CC Docket No. 94-102 and the Commission's related Public Notice, Mimeo DA 00-2099, released September 14, 2000, we hereby submit our report on the status of implementation plans for Wireless E-911 Phase II Automatic Location Information ("ALI"), as follows:

Background/Contact Information

1) Carrier Identifying Information:
Southern Illinois RSA Partnership d/b/a
First Cellular of Southern Illinois
TRS Number: 808674

2) Contact Information: Robert M. Jackson
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, N.W., Suite 300
Washington, D.C. 20037
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E-911 Phase II Location Technology Information

1) Type of Technology: At present, we intend to deploy a network based solution. This will require location sensors placed at each individual cell site and a Location Control System to be placed at our Mobile Switching Center ("MSC") location. This will track mobiles based on Time Difference on Arrival ("TDOA") algorithms. The ALI database would be facilitated by GTE/TSI (currently selected as out Phase I service bureau).

We have tentatively selected the Allen Telecom as our ALI equipment vendor of choice and presently intend to utilize its Geometrix Solution. Other prospective ALI equipment vendors investigated include: a) TruePosition; b) U.S. Wireless Corp.; and c) XYPoint.

2) Testing and Verification: It is presently anticipated that testing and verification will be performed as follows: Each individual cell site sector will have test calls placed on it utilizing various models of portable and 3 watt subscriber units. These tests will be performed using both AMPS and CDMA handsets. The geographic location of the subscriber unit can be verified by using a handheld GPS receiver and comparing the coordinates against the coordinates identified using the ALI equipment's Location Control System. Verification of PSAP routing will be dependent upon current routing as defined in the E-911 Phase 1 routing.

3) Implementation Details and Schedule: The equipment installation will be performed by the network solution vendor under a "turn-key" contract. It will consist of the following:

a) The location sensor receivers will be mounted into a 19 inch rack.

b) The RF connections required will be connected to the existing receive multicoupler racks utilized for the current AMPS and CDMA base station receive paths.

c) The existing GPS antenna network, necessary for our CDMA network, will be coupled into the location sensor.

d) A single DSO will be stripped off the site for the necessary communication link back to the MSC.

e) The DSO will be pulled off at the MSC via a profile database installed on the Location Control System.

f) As the ALI system is a "stand-alone" system, no software changes will be necessary for the infrastructure itself.

g) The network solution vendor will be responsible for the

validation of the accuracy of the ALI equipment, as part of the "turn-key" solution offering.

h) The ALI capability will already be available when Phase II is implemented, as we have negotiated with GTE/TSI to facilitate the ALI offering for E-911 Phase I. Our Phase I implementation is scheduled to be active by December 30, 2000.

4) PSAP Interface: The transmission of Phase II data will occur over the existing routing from GTE/TSI as provided in our Phase I implementation.

5) Existing Handsets: Since we will deploy a network based solution, it is not anticipated, at present, that any upgrade or replacement of existing customer handsets will be required.

6) Location of Non-Compatible Handsets: Since we anticipate that our network based solution will utilize the TDOA method, all handsets will be able to be located within our network, provided a call is active at the handset.

Respectfully submitted,

Southern Illinois RSA Partnership d/b/a First Cellular of Southern Illinois

Dated: 11/8/00

By: _____
Officer, General Partner